

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DISABILITY RIGHTS PENNSYLVANIA, :

Plaintiff, :

v. :

Civil Action No. 1:19-cv-00062-SPB

ERIE COUNTY, PENNSYLVANIA, :

Defendant. :

**PLAINTIFF'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND COSTS**

Pursuant to Federal Rule of Civil Procedure 54 and 42 U.S.C.A. § 1988 and the Court's Order dated May 29, 2019, Plaintiff, through its counsel, submit this Motion for an Award of Attorneys' Fees and Costs.

Plaintiff have secured a judicially-approved Consent Decree to resolve its claims under [42 U.S.C. §1983](#), the Protection and Advocacy for Individuals with Mental Illness Act (PAIMI Act), [42 U.S.C. §§ 10801-10827](#), and the Developmental Disabilities Assistance and Bill of Rights Act (DD Act), [42 U.S.C. §§ 15041-15045](#). As such, it is the prevailing party and should be awarded reasonable attorneys' fees and costs. The amount Plaintiff request, \$19,085, reflects the reasonable lodestar of its attorneys and the compensable costs incurred in the successful litigation of this matter.

In support of this Motion, Plaintiff submit the accompanying Memorandum of Law and Exhibits, which are incorporated by reference as if fully set forth herein.

Respectfully submitted,

Dated: June 26, 2019

By:

/s/ Andrew Favini

Andrew Favini (PA ID 316339)
Carol Horowitz (PA ID 81660)
Disability Rights Pennsylvania
429 Fourth Avenue, Suite 701
Pittsburgh, PA 15219-1505
(412) 391-5225 x. 132
(412) 467-8940 (fax)
afavini@disabilityrightspa.org

Counsel for Plaintiff